

AUG 5 1974

Gold Bond

GOLD BOND BUILDING PRODUCTS

DIVISION OF NATIONAL GYPSUM COMPANY

MILLINGTON PLANT • MILLINGTON, NEW JERSEY 07946

37114

August 1st, 1974

Robert Matthews, Attorney
Water Enforcement Branch
Enforcement & Regional Counsel Division
United States Environmental Protection Agency
Regional II
26 Federal Plaza
New York, New York 10007

Re: Millington, N.J. Plant
NPDES # NJ 0002429

ST

Dear Mr. Matthews:

Your letter and Mr. Scott Spitzer's phone call indicated that we are in non-compliance with the terms of our Effluent Discharge Permit. Further, that the most serious aspect is our failure to follow the details of proper procedures for non-compliance as outlined in the permit itself. If we were to offer an excuse in the way of explaining our failure, it would have to be that these forms and procedures are new to us and we were confused by some of the terminology and a little slow in setting up the new control procedures.

1. Comprehensive Monitoring Report - Sample Schedule I, due 6/30/74.

This requires continuous sampling and a flow rate determination on a 24 hour basis for 7 days of operations for both the water source and the discharge effluent to establish reliable comparative data. We feel that this should be done in accordance with the best possible procedures. We are waiting for equipment with which to measure the flow rate on a continuous basis and to take a 24 hour composite sample. Until this equipment is put into operation, we could not attempt to complete and file this report. The Plant will not be in operation during the first two weeks of August. We would therefore request that the filing of this Schedule-I Report be postpone until September 10th, 1974.

2. Discharge Monitoring Reports (EPA Form 3320-1) due 10th monthly.

Here we were confused in that we thought that these reports would start after the completion of the Schedule-I Report. Thru the years we have always sampled and tested to a limited degree our water source and discharge effluent. We have not always used the Total Suspended Solids Test but starting with the middle of June when we received the approved procedure, we have checked our effluent on a limited basis (8 hour composite sample).

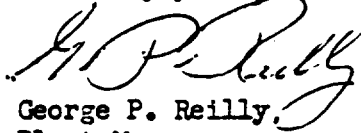
ASB 001 0923

Based on this data, we have filed a late report (7/29/74) for June and will file a report for July prior to August 10th. It should be clearly understood that this data is of a limited nature and not as reliable as it will be in the future (after our new equipment is in operation).

3. Compliance Schedule Engineering Report due 7/30/74.

It is now our understanding that our Buffalo Engineering Department has prepared this report and that it is in the mail to the State of New Jersey as required under Condition 11 (a).

Sincerely yours,


George P. Reilly,
Plant Manager

GPR:js

cc: Director
Division Water Resources
New Jersey Department of Environmental Protection
Labor & Industry Building
P.O. Box 1390
Trenton, New Jersey 08625